

REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-37 were pending. Claims 1-7, 15-21, and 27-37 were rejected. Claims 8-14, and 22-26 are objected to, but would be allowable if rewritten in independent forms.

In this response, no claim has been canceled. Claims 8 and 22 have been amended to particularly point out and distinctly claim, in full, clear, concise, and exact terms, the subject matter which Applicant regards as his invention. Specifically, claims 8 and 22 have been amended to include substantially all the limitations of the respective base and intervening claims. Claims 9-14 and 23-26 depend from claims 8 and 22 respectively. Thus, claims 8-14 and 22-26 are allowable.

Applicant acknowledges with appreciation the allowance of claims 8-14 and 22-26. However, at this time, Applicant elects not to place the limitations of the allowed claims into their corresponding independent claims because Applicant respectfully believes that the independent claims are in condition for allowance. No new matter has been added.

Claims 1-3, 15-17, and 27-28 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,097,389 of Morris et al. ("Morris") in view of U.S. Patent No. 6,604,165 of Terao ("Terao"). Claims 4-7, 18-21, and 29-37 are rejected under 35 U.S.C. 103(a) as being unpatentable over Morris in view of Terao and U.S. Patent No. 6,567,980 of Jain et al. ("Jain"). It is respectfully submitted that claims 1-37 include limitations that are not disclosed or suggested by the cited references, individually or in combination. Specifically, for example, independent claim 1 recites as follows:

1. A system comprising:

means for accepting a cartridge having a slot for receiving a removable memory device to store a plurality of media objects;

means for displaying the plurality of media objects in reduced visual representations in at least one track; and

means for navigating among the reduced visual representations.

(Emphasis added)

Independent claim 1 includes means for accepting a cartridge, where the cartridge includes a slot to receive a removable memory device and the removable memory device is used to store multiple media objects. The media objects may be displayed in a display device and navigated. It is respectfully submitted that the above limitations are absent from the cited references, individually or in combination.

As acknowledged by the Examiner, Morris fails to disclose means for accepting a cartridge having a slot for receiving a removable memory device storing the media objects. However, the Examiner maintains that section col. 1, lines 30-38 of Terao teaches the cartridge having a slot for receiving a removable memory device (see, Office Action, pages 2-3). Applicant respectfully disagrees.

Terao is related to a library device, particularly, a large-scale magnetic tape library, divided into multiple logical units that are controlled by a library controller. It is respectfully submitted that there is no suggestion within the cited section of Terao a cartridge having a slot to receive a removable memory device. Specifically, Terao states:

“RAU is a frame located on the right side of the subsystem and is a frame comprising a cartridge access station (CAS) 5, accessor (ACC) 6, and a plurality of cells (CELLs) 7. CAS 5 is a special cell for importing/exporting a recording medium to the library device and is operable in the online (READY) state. ACC 6 is a robot for transporting the recording medium within the library device, and the cells 7 are slots for storing recording media.”

(Terao, col. 1, lines 30-38).

Thus, although Terao discloses a cartridge access station (CAS) to access cartridges (e.g., magnetic tapes), Terao fails to disclose that the cartridge includes a slot to receive a removable memory device. It appears that the cartridges of Terao are the magnetic tapes used to store library contents in a large-scale library device that needs a robot to transport the medium. There is no suggestion in Terao that the cartridges (e.g., magnetic tapes) may include a slot to receive a removable memory device. It is respectfully submitted that one with ordinary skill in the art would not consider that the cartridges of Terao, particularly in a form of magnetic tapes is capable of having a slot to receive a removable memory device that stores the media objects.

In contrast, the present invention as claimed includes a cartridge having a slot to receive a removable memory device, where the removable memory device is used to store media objects. That is, the media objects are stored in the removable memory device that can be inserted into a slot of a cartridge, rather than being stored in the cartridge itself, contrary to the teachings of Terao. It is respectfully submitted that none of the cited references, individually or in combination, teaches or suggests the limitations set forth above.

It is respectfully submitted that there is no suggestion within the cited references to combine Morris with Terao and Jain. Particularly, Morris and Jain are related to a computer imaging processing mechanism while Terao is related to a large-scale library device. It is respectfully submitted that one with ordinary skill in the art would not combine these references.

Even if they were combined, such a combination still lacks the limitations set forth above. Therefore, for the reasons set forth above, independent claim 1 is patentable over the cited references.

Similarly, independent claim 15 includes limitations similar to those recited in claim 1. Thus, for the reasons similar to those discussed above, it is respectfully submitted that independent claim 15 is also patentable over the cited references.

In addition, according to one embodiment of the present invention as claimed, the cartridge having a slot to receive a removable memory device may be inserted into an interface of a console device, such as, for example, a game console device, rather than a large scale library device that needs a robot to transport the medium within the library device, as suggested by Terao. Specifically, for example, independent claim 28 recites as follows:

28. A system comprising
a removable storage device to store a plurality of stories, each story comprising
a plurality of media objects; and
a console comprising
a processor in communication with the removable storage device; and
an input interface for accepting the removable storage device, the
storage device having a slot for receiving a media card comprising the plurality of
media objects.

(Emphasis added)

Independent claim 28 includes a console device having an interface to accept a removable storage device (e.g., a cartridge), where the removable storage device further includes a slot to receive a media card (e.g., a removable memory device) that stores media objects. As discussed above, it is respectfully submitted that none of the cited references discloses or suggests these limitations. It is respectfully submitted that one with ordinary skill in the art would not consider the large-scale library device of Terao that needs a robot to transport the medium within the library device as a console device, similar in size to a game console device.

As discussed above, there is no suggestion within the cited references to combine Morris with Terao and Jain. Even if they were combined, such a combination still lacks the

limitations set forth above. Therefore, for the reasons discussed above, it is respectfully submitted that independent claim 28 is patentable over the cited references.

Similarly, independent claim 34 includes limitations similar to those recited in claim 28. Thus, for the reasons similar to those discussed above, it is respectfully submitted that independent claim 34 is also patentable over the cited references

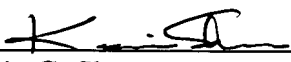
Given that dependent claims 2-7, 16-17, 27, 29-33, and 35-37 depend from one of the above independent claims, it is respectfully submitted that claims 2-7, 16-17, 27, 29-33, and 35-37 are patentable over cited references. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,
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